

# **EXHIBIT 1**

**Plaintiffs' More Definite Statement as to Yeslam Bin Laden**

1. This Court has personal jurisdiction of Yeslam Bin Laden. Before September 2001, Yeslam Bin Laden had significant contacts with and presence in the United States. From 1983 to 1998, he was the owner of a single family residence situated on 2.09 acres at 634 Stone Canyon Road, Los Angeles, California, United States of America (Bel Air lot 168). According to the assessor's report, the "owner occupied [the] location." On December 2, 1998, "Yeslam M. Binladin" transferred ownership of this property (valued at \$2,865,429) through a grant deed to Ibrahim Binladin, as detailed in the state of California's deed transfer records in document 000002354383. The name "Yeslam M Binladin" is also listed at the following addresses on the corresponding dates:

125 South Oakhurst Drive Apt. 101 Beverly Hills, CA 90212	01/01/1998
11728 Folkstone Lane Los Angeles, CA 90077	11/01/1999

2. Since September 11, 2001, Yeslam Bin Laden has been interviewed by Western media outlets. On July 9, 2004, Yeslam Bin Laden appeared on Dateline NBC to answer questions about his life since September 11<sup>th</sup>. On November 8, 2004, Time Magazine published an interview with Yeslam Bin Laden as reported from a correspondent in Paris, France.

3. Yeslam Bin Laden is an international business man. Along with numerous other global entities, Yeslam Bin Laden founded Cygnet S.A., later renamed Saudi Investment Company ("SICO"), in May 1980 in Geneva, Switzerland. SICO serves as the international investment arm of the Saudi Binladin Group ("SBG"), the Bin Laden family business based in Jeddah, Saudi Arabia. SICO's Curacao branch, established in 1984, manages SBG's partnership with the American Daniels Realty Corporation, part of the Fluor Corporation conglomerate

based in Aliso Viejo, California, United States of America. With the help of SBG, Fluor Corporation became one of the major recipients of reconstruction contracts in Kuwait.

4. Yeslam Bin Laden provided material support to his brother, Osama Bin Laden and the al Qaeda international terrorist network. This material support includes, but is not limited to, the acts of material support specified herein. The material support provided to Osama Bin Laden by his brother Yeslam Bin Laden was a proximate cause of the attacks of September 11, 2001 on the United States and the Plaintiffs herein.

5. In 2000 and 2001, Yeslam Bin Laden made donations to the Muslim World League Cultural Center in Geneva, which aided, abetted, and materially supported Defendant Hani Ramadan.

6. SICO received \$10 million from SBG in management funds during the 1990's. In addition to receiving funds from SBG, Yeslam's key positions within the Saudi Binladin Group include:

- Former Chief Financial Officer of the Bin Laden Organization in Saudi Arabia (a subsidiary of SBG involved in Sudan)
- Board Member of the Mohammed Binladin Organization, a wholly-owned subsidiary of SBG, along with Saleh Gazaz, Mohamed Bahareth, Abdullah Bin Said, Mohamed Nur Rahimi, Bakr M. Bin Laden, Tarek M. Bin Laden, and Omar M. Bin Laden.

7. The address of the Saudi Binladin Group (P.O. Box 958, Jeddah, Saudi Arabia) appears on an account (account # CO-565167) opened by Omar M. Bin Laden and Haider M. Bin Laden at UBS Bank in Geneva, Switzerland on August 17, 1990 for their brother, Osama Bin Laden. The authorized persons on the account were Yeslam M. Bin Laden and Osama Bin Laden, who was only authorized to use the account with the co-signature of Yeslam. The named economic beneficiary of the account was Osama Bin Laden. On August 20, 1990, \$450,000 was transferred into the account; on October 25, 1991, \$482,000 was transferred to Defendant Saudi American Bank in Jeddah in favour of Haider M. Bin Laden. The account was closed on

October 9, 1997. This joint account was among fifty-four others created to shelter the assets and financial activities of the Bin Laden family.

8. In a United States Department of Justice investigation, it was discovered that Osama Bin Laden had received funds from two accounts at Deutsche Bank in Geneva, Switzerland, in the names of Cambridge Engineering and the Saudi Binladin Group. An amount totalling nearly \$300 million was transferred through these accounts; Yeslam Bin Laden was the account manager for both. Cambridge Engineering Systems Ltd. was registered under the names Yahia Bin Laden, Shafiq Bin Laden, and Akber Moawalla. Moawalla, a former treasurer and Chief Financial Officer of SBG, is managing Falcon Ltd., a financial holding of the Bin Laden family registered in the Cayman Islands and owned by Fawzia Bin Laden, Ibrahim Bin Laden, Khalil Bin Laden, and Yeslam Bin Laden.

9. Tracfin, a financial intelligence service that reports to the French customs service, has investigated Yeslam Bin Laden on suspicion of money laundering based on “suspicious operations reports” filed by a number of banks concerning operations by Yeslam Bin Laden in the United Kingdom, France, and the British Virgin Islands. French authorities have recently expanded this investigation to also include terrorist financing.

10. Yeslam Bin Laden was questioned in 2004 by French Judge Renaud Van Ruymbeke regarding the testament of Mohammed Bin Laden, father of Yeslam and Osama, which details the Bin Laden family fortune and the origin of the funding for al Qaeda. During the questioning, Yeslam Bin Laden stated that in 1968 and 1969, all male heirs of Mohammed Bin Laden, including Osama, received nearly \$500,000 each. They also received an annuity every year thereafter of \$300,000, equivalent to their share of the dividends of the family business, SBG. Yeslam Bin Laden estimated that the total amount received by each heir of

Mohammed Bin Laden between 1974 and 1994 would range from \$12 - \$15 million. These inheritances provided a substantial base of funding for Osama Bin Laden and his al Qaeda organization.

11. Al Qaeda and other terrorist groups, in partnership with wealthy individuals, banks, financial entities and charities, have successfully implemented a global financing system to collect and distribute money to terrorist individuals, cells and networks in every corner of the world. These practices have allowed unscrupulous front groups, organizations, institutions, and/or charities to fund violent, extremist Islamic groups, including Al Qaeda. Al Qaeda and its mentors, sponsors, and facilitators are responsible for the horrific acts of terror on September 11, 2001. In addition to the actual monetary donations by Yeslam Bin Laden to corrupt charities, his use of his banking and financial institutions also provided a broad range of facilities, material support, and banking services to his brother Osama Bin Laden. These activities include assistance in the actual distribution of funds, the maintenance of bank accounts for various charities and individuals associated with the al Qaeda, accounts specifically set up for the collection of donations; use of joint accounts; and the facilitation of wire transfers to and from various al Qaeda related entities.

12. Al Qaeda, and other international terrorist organizations, raise money from a variety of sources and move money in a variety of manners. Once the system is in place to raise the money, a set of mechanisms is necessary to move the money. "The first, and most simple, is the ubiquitous and highly efficient global financial system, including the interconnected network of banks and other financial institutions that undergird the global economy. For years, Al Qaeda has been particularly attracted to operating in under-regulated jurisdictions, places with limited bank supervision, no anti-money laundering laws, ineffective law enforcement institutions, and a

culture of no-questions-asked bank secrecy.” *“Terrorist Financing, Report of an Independent Task Force Sponsored by the Council on Foreign Relations”* (*“Terrorist Financing Report”*), pg. 14, Maurice R. Greenberg, Chair, 2002.

13. Charities that directly (or through indirect channels) sponsor, fund, materially support, conspired to cause, aid and/or abet international terrorism rely extensively on funds from donations made by and/or passed through Islamic banks or charities, and they rely on individuals including but not limited to Yeslam Bin Laden, to facilitate the illicit transfer of funds.

14. Since at least 1998, Osama Bin Laden made open and public calls for Muslims to donate to his terrorist organization. In December 1998, during an interview with ABC News, Osama Bin Laden said “Muslims and Muslim merchants, in particular, should give their Zakat and their money in support of this state [the Taliban Regime] which is reminiscent of the state of Medina (Al-Munawwarah), where the followers of Islam embraced the Prophet of God.”

15. On August 21, 1998, the President of the United States signed an Executive Order blocking the assets of Osama Bin Laden and his terrorist cells, including Al Qaeda, as international terrorists. Osama Bin Laden, his sponsors and followers, were known to openly promoting hatred and violence against innocents long before this time. On September 23, 2001, in direct response to the terrorist acts on September 11, the President signed Executive Order 13224, which ordered the blocking of property of and prohibition of transactions with persons who commit, threaten to commit, or provide financial or other support to support terrorism. The list of these “specially designated global terrorists” or terrorist organizations (“SDGT”) included Osama Bin Laden and al Qaeda.

16. Osama Bin Laden and his al Qaeda organization were sponsored by a network of

banks, charities and individuals, including Yeslam Bin Laden. Yeslam Bin Laden provided material support to Osama Bin Laden while he was in The Republic of Sudan during the early 1990's. Yeslam Bin Laden provided funding and financial support for Osama Bin Laden's international terrorist operations, infrastructure, and organizations in the Sudan.

17. In early 2001, Yeslam Bin Laden paid for certain individuals to take flight training lessons at Huffman Aviation in Venice, Florida, United States of America. Mohammed Atta and Marwan Al Shehhi attended this flight training school prior to hijacking Flights 11 and 175, respectively, and crashing them into the World Trade Center on September 11, 2001. Yeslam Bin Laden financed trips to the United States and flight lessons over the course of the year in 2001. Similarly, Yeslam Bin Laden also paid for certain individuals to take flight training lessons at a flight school in Tucson, Arizona, United States of America.

18. Yeslam Bin Laden knew or had to know that Al Qaeda was an international terrorist organization that was widely and publicly known to openly promote indiscriminate violence against America and that its target was and remains the United States. Yeslam Bin Laden also knew or had to know that Al Qaeda was and is the recipient of millions of dollars from corrupt charities, including Muslim World League. As such, Yeslam Bin Laden aided, abetted, acted in concert with and/or materially supported al Qaeda terrorists and international terrorist activities.

19. Yeslam Bin Laden knew or had to know that he was providing material support to international terrorism and terrorist activities through his financial dealings with his brother Osama Bin Laden. Despite knowledge of Osama Bin Laden's intentions and goals, Yeslam Bin Laden continued his financial partnership and collaboration with Osama Bin Laden and as a result, Yeslam Bin Laden himself aided, abetted, conspired with and/or materially supported

international terrorism and terrorist activities. This material support was a proximate cause of the September 11, 2001 attacks and the damages suffered by Plaintiffs.

20. Plaintiffs incorporate the contents of the Third Amended Complaint dated November 22, 2002.